



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

9/4/2008

STACY SCHMIDT  
THE ANDERSONS RIVER ELEVATOR  
PO BOX 119  
MAUMEE, OH 43537

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0448010495  
Permit Number: P0088140  
Permit Type: Renewal  
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc), from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: TDES

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
THE ANDERSONS RIVER ELEVATOR**

Facility ID: 0448010495  
Permit Number: P0088140  
Permit Type: Renewal  
Issued: 9/4/2008  
Effective: 9/4/2008  
Expiration: 9/4/2018





**Air Pollution Permit-to-Install and Operate**  
for  
**THE ANDERSONS RIVER ELEVATOR**

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**Final Permit-to-Install and Operate**  
**Permit Number:** P0088140  
**Facility ID:** 0448010495  
**Effective Date:** 9/4/2008

## Authorization

Facility ID: 0448010495  
Application Number(s): A0019291  
Permit Number: P0088140  
Permit Description: The andersons river elevator - final PTIO T&C  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 9/4/2008  
Effective Date: 9/4/2008  
Expiration Date: 9/4/2018  
Permit Evaluation Report (PER) Annual Date: Feb 15, for Jan 1 - Dec 31  
This document constitutes issuance to:

THE ANDERSONS RIVER ELEVATOR  
440 KUHLMAN DRIVE  
TOLEDO, OH 43609

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0088140  
Permit Description: The andersons river elevator - final PTIO T&C

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

- Emissions Unit ID: F001**  
Company Equipment ID: TRUCK DUMPS  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F002**  
Company Equipment ID: INTERNAL OPERATIONS  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F003**  
Company Equipment ID: RAIL LOADING AND UNLOADING  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F004**  
Company Equipment ID: SHIPLOADING SPOUTS  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F005**  
Company Equipment ID: ROADWAYS AND PARKING AREA  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable
- Emissions Unit ID: F006**  
Company Equipment ID: SHIP UNLOADING  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable



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**Effective Date:** 9/4/2008

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



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**Final Permit-to-Install and Operate**

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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0088140

**Facility ID:** 0448010495

**Effective Date:** 9/4/2008

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0088140

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**Effective Date:** 9/4/2008

## **C. Emissions Unit Terms and Conditions**



**1. F001, TRUCK DUMPS**

**Operations, Property and/or Equipment Description:**

Truck dumps 1-6 with controls

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1) through f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	truck dumps #1, #2, #3, #4; each with an enclosure and fabric filtration system	
a.	OAC rule 3745-17-07(B)(1)	See b)(2)a.
b.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)b.
	truck dumps #5 & #6 each with an enclosure and fabric filtration system	
c.	OAC rule 3745-31-05(A)(3) (PTI 04-109 as issued July 2, 1978)	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
d.	OAC rule 3745-17-07(B)(1)	See b)(2)a.
e.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)d.
	truck dumps #1 thru #6; with a combined maximum capacity of 50,000 bushels per hour	
f.	OAC rule 3745-31-05(D)	The combined fugitive emissions of particulate matter equal to or less than ten microns in diameter (PM10) from all truck dump operations shall not exceed 37.49 tons per year.
		The combined stack emissions of PM10 from all truck dump operations shall not exceed 3.37 tons per year.
		See b)(2)c. and b)(2)e.



(2) Additional Terms and Conditions

- a. The visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average, except as provided by rule.
- b. The permittee shall employ reasonably available control measures for the purpose of ensuring compliance. The permittee has committed to the following to ensure compliance:
  - i. the permittee shall maintain and operate an enclosure and ventilation system sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture; and

the control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. The permittee shall employ best available control measures for the purpose of ensuring compliance. The permittee has committed to the following to ensure compliance:
  - i. each truck dump shall be adequately enclosed by a three-sided structure with a roof and vented to a fabric filter. The truck dump door shall be closed during the unloading of tail gate trailers. The truck dump door may be left open during the unloading of bottom gate trailers, but the dust collection system shall remain operating;
  - ii. the control equipment shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases; and
  - iii. the visible particulate emissions from any stack serving these emissions sources shall not exceed zero percent opacity as a six-minute average.

Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



- e. PTI 04-109 does not establish allowable emissions rates. The annual emission limitations were established to reflect the federally enforceable potential to emit for this emissions unit based on a maximum grain handling capacity of 50,000 bushels per hour and 8,760 hours of operation per year. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
  
- c) Operational Restrictions
  - (1) The permittee shall operate the fabric filter associated with each truck dump whenever the respective truck dump is in operation
  
- d) Monitoring and/or Recordkeeping Requirements
  - (1) The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process(es) was (were) in operation.
  - (2) The permittee shall perform daily checks, when one (or more) truck dump(s) is in operation and when the weather conditions allow, for any visible particulate emissions from each applicable stack and for any visible fugitive particulate emissions from any applicable egress points (i.e., doors, openings, etc.) serving the operational truck dump(s). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the location and color of the emissions;
    - b. whether the emissions are representative of normal operations;
    - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
    - d. the total duration of any visible emission incident; and
    - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
  
- e) Reporting Requirements
  - (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



- a. The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any daily record showing that a fabric filter was not in service when the associated material handling operation was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services).
- b. The permittee shall submit written reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from any egress points (i.e., doors, openings, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions.
- c. If no deviations occurred during a three-month period, the permittee shall submit a quarterly report, which states that no deviations occurred during that period.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

- b. Emission Limitation:

The visible particulate emissions from any stack serving these emissions sources shall not exceed zero percent opacity as a six-minute average.



Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases, from any stack serving truck dumps #1 thru #4.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(7).

d. Emission Limitation:

There shall be no visible particulate emissions from the exhaust stack(s), from any stack serving truck dumps #1 thru #4.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(4).

e. Emission Limitation:

The control equipment shall achieve an outlet emission rate of not greater than 0.01 grain of particulate emissions per dry standard cubic foot of exhaust gases, from any stack serving truck dumps #5 and #6.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(7).

f. Emission Limitation:

The combined fugitive emissions of PM10 from all truck dump operations shall not exceed 37.49 tons per year.

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation was based on emission factors specified in USEPA reference document AP-42,



Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, as follows: multiply the worst case particulate emission factor (0.059 pound of PM10 per ton of grain) by the maximum grain unloading rate (50,000 bushels of grain per hour with an assumed density of 58 pounds per bushel, or 1450 tons of grain per hour), by 1 minus the capture efficiency (1-0.90), by the maximum annual hours of operation (8760 hrs), and then divide by 2000 lbs/ton.

g. Emission Limitation:

The combined stack emissions of PM10 from all truck dump operations shall not exceed 3.37 tons per year.

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation was based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, as follows: multiply the worst case particulate emission factor (0.059 pound of PM10 per ton of grain) by the maximum grain unloading rate (50,000 bushels of grain per hour with an assumed density of 58 pounds per bushel, or 1450 tons of grain per hour), by the capture efficiency (0.90), by 1 minus the control efficiency (1-0.99), by the maximum annual hours of operation (8760 hrs), and then divide by 2000 lbs/ton.

If required, the permittee shall determine a site specific particulate emission factor in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, USEPA approved test methods, may be used with prior written approval.

g) Miscellaneous Requirements

- (1) None.



**2. F002, INTERNAL OPERATIONS**

**Operations, Property and/or Equipment Description:**

Legs, conveyors and cleaners with controls

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1) through f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)(1)	See b)(2)a.
b.	OAC rule 3745-17-08(B)(3)	See b)(2)b.
c.	OAC rule 3745-31-05(D)	The combined fugitive emissions of particulate matter equal to or less than ten microns in diameter (PM10) from all operations shall not exceed 4.91 tons per year.
		The combined stack emissions of PM10 from all operations shall not exceed 4.87 tons per year.
		See b)(2)c. and b)(2)d.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

b. The permittee shall employ reasonably available control measures for the purpose of ensuring compliance. The permittee has committed to the following to ensure compliance:



- i. the permittee shall maintain and operate an enclosure and ventilation system sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture; and
- ii. the control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. The visible particulate emissions of fugitive dust from this emissions unit shall not exceed 10% opacity as a 3-minute average.
- d. PTI 04-109 does not establish allowable emissions rates. These emission limitations represent the maximum potential to emit of this emissions unit with controls.

c) Operational Restrictions

- (1) The permittee shall operate the fabric filter associated with each process comprising this emissions unit whenever the respective process is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process(es) was (were) in operation.
- (2) The permittee shall perform daily checks, when one (or more) material handling operation(s) comprising this emissions unit is in use and when the weather conditions allow, for any visible particulate emissions from each applicable stack and for any visible fugitive particulate emissions from any applicable egress points (i.e., doors, openings, etc.) serving the operational material handling operation(s). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended.



The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any daily record showing that a fabric filter was not in service when the associated material handling operation was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Toledo Division of Environmental Services) on a semi-annual basis.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The permittee shall submit written reports that (a) identify all days during which any visible particulate emissions were observed from any stack serving this emissions unit, (b) identify all days during which any visible fugitive particulate emissions were observed from any egress points (i.e., doors, openings, etc.) serving this emissions unit, and (c) describe any corrective actions taken to minimize or eliminate the visible particulate and/or visible fugitive particulate emissions.
  - b. If no deviations occurred during a three-month period, the permittee shall submit a quarterly report, which states that no deviations occurred during that period.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
visible particulate emissions of fugitive dust shall not exceed 10% opacity as a 3-minute average from any egress serving this emissions unit



Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

b. Emission Limitation:

0.030 grain of particulate per dry standard cubic foot, from any stack serving this emissions unit

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(7).

c. Emission Limitation:

no visible particulate emissions, from any stack serving this emissions unit

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(4).

d. Emission Limitation:

the fugitive emissions of PM10 shall not exceed 4.91 tons per year

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation was based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 3/03, as follows: multiply the worst case particulate emission factor (0.034 pound of PM10 per ton of grain) by the maximum grain unloading rate (3,300 tons of grain per hour), by 1 minus the capture efficiency (1 - 0.99), by the maximum annual hours of operation (8760 hrs), and divide by 2000 lbs/ton.

e. Emission Limitation:

the combined stack emissions of PM10 shall not exceed 4.87 tons per year

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation was based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated



5/98, as follows: multiply the worst case particulate emission factor (0.034 pounds of PM10 per ton of grain), by the maximum grain transfer rate (3,300 tons of grain per hour), by the capture efficiency (0.99), by the baghouse control efficiency (1 - 0.99), by the maximum annual hours of operation (8760 hrs), and divide by 2000 lbs/ton.

If required, the permittee shall determine a site specific particulate emission factor in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, USEPA approved test methods, may be used with prior written approval.

g) Miscellaneous Requirements

- (1) None.



**3. F003, RAIL LOADING AND UNLOADING**

**Operations, Property and/or Equipment Description:**

rail car loading and unloading with controls

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1) through f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	railcar loading station, 1,500 tons per hour with enclosure and fabric filtration system	
a.	OAC rule 3745-17-07(B)(1)	See b)(2)a.
b.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)b
	railcar unloading station, 1,200 tons per hour with enclosure and fabric filtration system	
c.	OAC rule 3745-17-07(B)(1)	See b)(2)a.
d.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)b.
	railcar loading and unloading stations with enclosure and fabric filtration system	
e.	OAC rule 3745-31-05(D)	The combined fugitive emissions of particulate matter equal to or less than ten microns in diameter (PM10) from the railcar loading and unloading operations shall not exceed 4.10 tons per year. The combined stack emissions of PM10 from the railcar loading and unloading operations shall not exceed 0.37 ton per year.



(2) Additional Terms and Conditions

- a. The visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average, except as provided by rule.
- b. The permittee shall employ reasonably available control measures for the purpose of ensuring compliance. The permittee has committed to the following to ensure compliance:
  - i. the permittee shall maintain and operate an enclosure and ventilation system sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture;
  - ii. the control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent; and
  - iii. the rail car loading and unloading operations shall be enclosed by a two-sided structure with a roof and vented to a fabric filter.

Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c) Operational Restrictions

- (1) The permittee shall operate the fabric filter associated with each process comprising this emissions unit whenever the respective process is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when a fabric filter was not in service when the associated process(es) was (were) in operation.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from the egress points (i.e., doors, openings, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and



- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any daily record showing that a fabric filter was not in service when the associated material handling operation was in operation. The notification shall include a copy of such record.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:

The visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).



a. Emission Limitation:

The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases from any stack serving this emissions unit.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(7).

b. Emission Limitation:

There shall be no visible particulate emissions from any stack serving this emissions unit.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(4).

c. Emission Limitation:

the combined fugitive emissions of PM10 from the railcar loading and unloading operations shall not exceed 4.10 tons per year

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation was based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated 5/98, as follows: multiply the greater of the allowable PM10 emission factors for unloading or loading (emissions factors for unloading are greater than the emissions factors for loading at 0.0078 vs 0.0022 pounds per ton), by the maximum grain transfer rate (1,200 tons of grain per hour for grain unloading), by 1 minus the capture efficiency (1-0.90), by the maximum annual hours of operation (8760 hrs), and divide by 2000 lbs/ton.

d. Emission Limitation:

the combined stack emissions of PM10 from the railcar loading and unloading operations shall not exceed 0.37 ton per year

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation was based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 dated



5/98, as follows: multiply the greater of the allowable PM10 emission factors for unloading or loading (emissions factors for unloading are greater than the emissions factors for loading at 0.0078 vs 0.0022 pounds per ton), by the maximum grain transfer rate (1,200 tons of grain per hour for grain unloading), by the capture efficiency (0.90), by the baghouse control efficiency (1 - 0.99), by the maximum annual hours of operation (8760 hrs), and divide by 2000 lbs/ton.

If required, the permittee shall determine a site specific particulate emission factor in accordance with methods and procedures of Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, USEPA approved test methods, may be used with prior written approval.

g) Miscellaneous Requirements

- (1) Railcar loading and unloading take place in the same structure. Only one operation can take place at a time (i.e., either loading or unloading).



**4. F004, SHIPLOADING SPOUTS**

**Operations, Property and/or Equipment Description:**

shiploading spouts 1-7

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1) through f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR 52.1870(c)(77)	See b)(2)a.
b.	OAC rule 3745-17-07(B)(1)	See b)(2)b.
c.	OAC rule 3745-17-08(B)(4)	See b)(2)b.
d.	OAC rule 3745-35-07(B)(2)	The combined fugitive emissions of particulate matter equal to or less than ten microns in diameter (PM10) from all shiploading operations shall not exceed 8.43 tons per year. See b)(2)c.

(2) Additional Terms and Conditions

a. The permittee has committed to the following to ensure compliance:

- i. visible particulate emissions of fugitive dust from the shiploading spouts shall not exceed 20% opacity, except for when loading specialty grain;
- ii. visible particulate emissions of fugitive dust from the shiploading spouts while loading specialty grain shall not exceed 40% opacity; and



- iii. the control for this emissions unit shall be an oil spray system. This system shall be used during the entire process of shiploading (except for specialty grain), which includes topping off the holds.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- b. The particulate emissions limitation established by 40 CFR 52.1870(c)(77) replaces the particulate emissions limitations established by OAC rules 3745-17-07(B)(1) and 3745-17-08(B)(4) for this emissions unit.
- c. The annual emission limitations were established to reflect the federally enforceable potential to emit for this emissions unit based on a maximum grain handling capacity of 24,000 bushels per hour (a maximum of 2 spouts operating simultaneously with a capacity of 12,000 bushels per hour each) operating 8760 hours per year (for a total of 210,000,000 bushels per year of which a maximum of 8,000,000 bushels is specialty grain).

c) Operational Restrictions

- (1) The total throughput of all specialty grains shall be limited to 8,000,000 bushels per year.

d) Monitoring and/or Recordkeeping Requirements

- (1) For non-specialty grains, the permittee shall maintain records to demonstrate compliance with the oil spray control requirement, which shall include the following information:
  - a. the amount of oil, in gallons, employed per shipload;
  - b. the bushels of grain loaded per shipload; and
  - c. the amount of oil, in gallons per bushel, employed per shipload.
- (2) For non-specialty grains, the permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the egress points (i.e., shiploading spouts, ship holds, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the location and color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.



If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) For each specialty grain shipment loaded, the permittee shall maintain verification that the customer will not allow the application of oil (i.e., a copy of the contract, letter from the purchaser, or equivalent).
  - (4) The permittee shall record the throughput of each specialty grain loaded, and the combined throughput of all speciality grains as a rolling, 12-month summation.
  - (5) For specialty grains, the permittee shall take opacity readings (performed as specified in f)(1)b. by certified observer(s)) totalling, at a minimum, one hour during topping off and three hours during the bulk loading. This shall be done for the first three vessels per year which individually load more than 800,000 bushels of specialty grains. The reading time shall be distributed over the individual loading spouts so as to be approximately proportional to the usage of each spout.
  - (6) The permittee shall record the following information for each set of visible emission readings taken while loading specialty grains:
    - a. the date the readings were taken;
    - b. the time the readings were taken;
    - c. the observer's name;
    - d. the identity of each spout observed;
    - e. whether the readings were taken during the bulk loading or topping off; and
    - f. the visible emission readings.
- e) Reporting Requirements
- (1) The permittee shall notify the Toledo Division of Environmental Services at least 24 hours prior to the loading of specialty grain.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. For specialty grain, the permittee shall submit semi-annual deviation (excursion) reports that identify any periods of time during which the total throughput of specialty grains exceeded the allowable limitation.



The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20% opacity while loading non-specialty grains

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A as such appendix existed on July 1, 1984, with the following modification: opacity observations shall be made from a position that provides the observer with a clear view of the source and the visible emissions, with the sun behind the observer. To the extent possible, the line of sight should be approximately perpendicular to the flow of visible emissions and to the longer axis of the emissions. Opacity observations shall be made at the point of highest opacity within the visible particulate emissions. However, if observations are made immediately above the hold opening, they shall be made at least one meter above the hold so as not to include dust which is falling back into the hold.

- b. Emission Limitation:

40% opacity while loading specialty grains

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A as such appendix existed on July 1, 1984, with the following modification: opacity observations shall be made from a position that provides the observer with a clear view of the source and the visible emissions, with the sun behind the observer. To the extent possible, the line of sight should be approximately perpendicular to the flow of visible emissions and to the longer axis of the emissions. Opacity observations shall be made at the point of highest opacity within the visible particulate emissions. However, if observations are made immediately above the hold opening, they shall be made at least one meter above the hold so as not to include dust which is falling back into the hold.



c. Emission Limitation:

The fugitive emissions of PM10 from all ship loading operations shall not exceed 8.43 tons per year.

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the hourly potential to emit, based upon the worst case operating scenario. This calculation was based on company supplied emission factors for specialty and non-specialty grains as follows: multiply the uncontrolled particulate emission factor (0.012 pound of PM10 per ton of grain) by one minus the control efficiency (1 - 0.80), by the maximum annual non-specialty (oil spray treated) grain loading rate (210,000,000 - 8,000,000 bushels of grain per year at 58 pounds per bushel, divided by 2000 pounds per ton = 5,860,000 tons) divided by 2000 pounds per ton. To this, add the uncontrolled particulate emission factor (0.012 pound of PM10 per ton of grain) multiplied by the maximum annual specialty grain loading rate (8,000,000 bushels per year at 58 pounds per bushel, divided by 2000 pounds per ton = 232,000 tons) divided by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) "Bulk loading" is defined as that portion of the shiploading occurring when the distance between the uppermost part of the grain pile and the top of the hatch opening is greater than four feet.

"Specialty grain" is defined as grain, including oil seeds, intended for a specialty use or process by a purchaser who will not accept the application of oil on the grounds that the oil may affect the process or the end product use.

"Topping off" is defined as that portion of the shiploading occurring when the distance between the uppermost part of the grain pile and the top of the hatch opening is four feet or less.



**5. F005, ROADWAYS AND PARKING AREA**

**Operations, Property and/or Equipment Description:**

roadways and parking areas

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1) through f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
paved roadways and parking areas (see b)(2)a.)		
a.	OAC rule 3745-17-07(B)(4)	No visible particulate emissions except for 6 minutes during any 60-minute period
b.	OAC rule 3745-17-08(B), (B)(8), (B)(9)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust  See b)(2)c., b)(2)d., and b)(2)f. through b)(2)j.
c.	OAC rule 3745-35-07(B)(2)	The fugitive emissions of particulate matter equal to or less than ten microns in diameter (PM10) from paved roadways and parking lots shall not exceed 5.68 tons per year.  See b)(2)k.
unpaved roadways and parking areas (see b)(2)b.)		
d.	OAC rule 3745-17-07(B)(5)	No visible particulate emissions except for 13 minutes during any 60-minute period
e.	OAC rule 3745-17-08(B), (B)(8),	Reasonably available control measures



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(B)(9)	that are sufficient to minimize or eliminate visible emissions of fugitive dust  See b)(2)e. through b)(2)j.
f.	OAC rule 3745-31-05(D)	The fugitive emissions of PM10 from unpaved roadways and parking lots shall not exceed 0.08 ton per year.  See b)(2)k.

(2) Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:  
  
Paved roadways: inbound roadway, outbound roadway and staging road  
  
Paved parking areas: none
- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:  
  
Unpaved roadways: none  
  
Unpaved parking areas: staging area
- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the paved roadways and parking areas by flushing with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- d. The permittee shall employ reasonably available control measures on the unpaved shoulders of all paved roadways for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the unpaved shoulders of all paved roadways with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance.



Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- f. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- g. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measures specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- h. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- i. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- j. Implementation of the above control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.
- k. This emission limitation represents the maximum potential to emit of this emissions unit with controls.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas in accordance with the following frequencies:

paved roadways and parking areas minimum inspection frequency

all daily



unpaved roadways and parking areas minimum inspection frequency

all daily

- (2) The purpose of the inspections is to determine the need for implementing the control measures specified in b)(2). The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.
- (4) The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(4)d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a semiannual basis within 30 days after the end of each calendar half-year.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

No visible particulate emissions except for 6 minutes during any 60-minute period.

Applicable Compliance Method:

Compliance with the visible emissions limitation(s) for the paved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

b. Emission Limitation:

No visible particulate emissions except for 13 minutes during any 60-minute period.

Applicable Compliance Method:

Compliance with the visible emissions limitation(s) for the unpaved roadways and parking areas identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources," as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

c. Emission Limitation:

The fugitive emissions of PM10 from paved roadways and parking lots shall not exceed 5.68 tons per year.

Applicable Compliance Method:

Compliance with the PM10 emissions limitation for all paved roadways and parking areas shall be determined by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation utilizes the emission factors and procedures specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.1.3 dated 11/06, as follows:

$$E = k[sL/2]^{0.65} \times [W/3]^{1.5} - C$$

$$E = 0.016 [(8.2)/2]^{0.65} \times [(18)/3]^{1.5} - (0.00047)$$

$$E = 0.59 \text{ lb/VMT}$$



where:

C = emission factor for the exhaust, brake wear and tire wear = 0.00047 lb/VMT

E = particulate emissions factor, lb/VMT

k = particle size multiplier, paved = 0.016 #PM10/VMT

sL = road size silt loading (g/m<sup>2</sup>), table 13.2.1-4 quarry operations = 8.2 g/m<sup>2</sup>

W = average weight (tons) of the vehicles traveling the road, 18 tons

and based on the maximum loadout rates of 1500 tons per hour by railcar and 696 tons per hour by ship, 8760 hours per year of operation, an average truck load of 40 tons of grain per vehicle trip, 0.20 miles per trip and 80% effective control:

$$\text{annual emissions} = (0.59 \text{ lb/VMT})(1500 + 696 \text{ t/hr})(8760 \text{ hr/yr})(1 \text{ t}/2000 \text{ lb})(1 \text{ trip}/40 \text{ t})(0.20 \text{ VMT/trip})(1-0.80)$$

$$\text{annual emissions} = 5.68 \text{ tons per year}$$

d. Emission Limitation:

The fugitive emissions of PM10 from unpaved roadways and parking lots shall not exceed 0.08 ton per year.

Applicable Compliance Method:

Compliance with the PM10 emissions limitation for all unpaved roadways and parking areas shall be determined by a one-time calculation of the annual potential to emit, based upon the worst case operating scenario. This calculation utilizes the emission factors and procedures specified in in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 13.2.2.2 dated 11/06, as follows:

$$E = k (s/12)^a (W/3)^b$$

$$E = (1.5) (5/12)^{0.9} (2/3)^{0.45}$$

$$E = 0.57 \text{ lb/VMT}$$

where:

$$a = 0.9$$

$$b = 0.45$$

E = particulate emissions factor, lb/VMT

k = particle size multiplier, 1.5 lb PM10/VMT

s = surface material silt content (%) = 5%



W = average weight (tons) of the vehicles = 2 tons

and based on the annual particulate emissions factor, E (0.57 lb/vmt), the annual vehicle mileage (at a company established maximum of 40 vehicle trips per day and 0.10 miles per trip = 1460 miles per year) and 80% effective control:

annual emissions =  $(0.57 \text{ lb/VMT})(1460 \text{ VMT/yr})(1 \text{ t}/2000 \text{ lb})(1-0.80)$

annual emissions = 0.08 ton per year:

g) Miscellaneous Requirements

(1) None.



**6. F006, SHIP UNLOADING**

**Operations, Property and/or Equipment Description:**

self-unloading ship operation controlled by a fabric filter

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1) through f)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (established by PTI 04-1042, as issued October 2, 1996)	The emissions of particulate matter equal to or less than ten microns in diameter (PM10) from the ship unloading operation shall not exceed 0.011 pound per ton of grain unloaded. See b)(2)a.
b.	OAC rule 3745-31-05(D)	The emissions of particulate matter equal to or less than ten microns in diameter (PM10) from the ship unloading operation shall not exceed 0.93 ton per year.
c.	OAC rule 3745-17-07(B)(1)	See b)(2)b.
d.	OAC rule 3745-17-08(B), (B)(3)	See b)(2)c.
e.	40 CFR Part 60, Subpart DD	See b)(2)d.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart DD and OAC rules 3745-17-07(B)(1) and 3745-17-08(B).



- b. The visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.
- c. The permittee shall employ best available control measures for the purpose of ensuring compliance. The permittee has committed to the following to ensure compliance:
  - i. The permittee shall maintain and operate an enclosure and ventilation system sufficient to minimize or eliminate visible emissions of fugitive dust at the point of capture.
  - ii. The control equipment shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible particulate emissions from the exhaust stack(s), whichever is less stringent.

Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- d. In accordance with 40 CFR 60.302(d)(3), the permittee shall use methods of emission control demonstrated to the Administrator's satisfaction to reduce emissions of particulate matter to the same level as, or less than, the requirements of 40 CFR 60.302(d)(1) and (d)(2). These equivalent methods have been determined to be the use of a self-unloading ship, discharging into a receiving hopper equipped with a dust collection system, utilizing a fabric filter and enclosed conveyors.
- c) **Operational Restrictions**
    - (1) The total throughput of all grains shall be limited to 8,000,000 bushels per year.
  - d) **Monitoring and/or Recordkeeping Requirements**
    - (1) The permittee shall maintain the following monthly records:
      - a. the total quantity of grain unloaded, in bushels; and
      - b. the total quantity of grain unloaded as a rolling, 12-month summation.
    - (2) The permittee shall perform daily checks, when this emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible fugitive particulate emissions from any egress points (i.e., conveyor enclosure, hopper transfer point, etc.) serving the material handling operation(s). The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
      - a. the location and color of the emissions;
      - b. whether the emissions are representative of normal operations;



- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. The permittee shall deviation (excursion) reports that identify any periods of time during which the total throughput of grain exceeded the allowable limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The visible particulate emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).



b. Emission Limitation:

0.030 grain of particulate per dry standard cubic foot, from any stack serving this emissions unit

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(7).

c. Emission Limitation:

no visible particulate emissions, from any stack serving this emissions unit

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the procedures specified in OAC rule 3745-17-03(B)(4).

d. Emission Limitation:

0.011 pound of PM10 per ton of grain unloaded

Applicable Compliance Method:

This emission factor was developed from emissions factors specified in USEPA reference document AP-42, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 "Particulate Emission Factors For Grain Elevators" dated 3/03, as follows: for the receiving of grain by ship, multiply the uncontrolled emissions factor of 0.038 pound of PM10 per ton of grain by 1 minus the capture efficiency (1 - 0.80) and to this quantity add the uncontrolled emissions factor of 0.038 pound of PM10 per ton of grain multiplied by the capture efficiency (0.80) and 1 minus the control efficiency (1 - 0.99) .

e. Emission Limitation:

PM10 shall not exceed 0.93 ton per year

Applicable Compliance Method:

This emissions limitation was developed by a one-time calculation of the restricted potential to emit, based upon the worst case operating scenario. This calculation was based on emissions factors developed from USEPA reference document AP-42, Compilation of Air Pollution Emission Factors, Table 9.9.1-1 "Particulate Emission Factors For Grain Elevators" dated 3/03, as follows: for the receiving of grain by ship, multiply the uncontrolled emissions factor of 0.038 pound of PM10 per ton of grain by 1 minus the capture efficiency (1 - 0.80) and to this quantity add the uncontrolled emissions factor of 0.038 pound of PM10 per ton of grain multiplied by the capture efficiency (0.80) and 1 minus the control efficiency (1 - 0.99). Multiply this controlled emissions factor (0.008 pounds PM10



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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per ton of grain) by the maximum annual grain throughput rate (8,000,000 bushels per year multiplied by 58 pounds per bushel divided by 2000 pounds per ton = 232,000 tons per year) and divide by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.